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Attorneys for Defendant
PRINCE GEORGE COUNTY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN JOSE)

JASON GLOVER,
Plaintiff,

v.

PRINCE GEORGE COUNTY, a
municipal corporation; MELVIN HIGH,
in his official capacity as Chief of Police
for PRINCE GEORGE'S COUNTY
POLICE DEPARTMENT; MICHAEL
JACKSON, in his official capacity as
Sheriff for PRINCE GEORGE'S
COUNTY; UNITED STATES OF
AMERICA, a municipal corporation;
JOHN CLARK, in his official capacity
as Director of the UNITED STATES
MARSHAL'S SERVICE; and DOES
1-25,

Defendants.

No. C08-02043PVT

**STIPULATED REQUEST FOR ORDER
ENLARGING AND CHANGING TIME
(Civil L.R. 6.2)**

IT IS HEREBY STIPULATED by and between Plaintiff Jason Glover and Defendant Prince George County that the Court issue an Order changing the time of the Case Management Conference currently scheduled for October 7, 2008, and allow defendant an enlargement of time to respond to the Complaint for Damages. Defendant was served with the Complaint on August 14, 2008 and has until September 3, 2008 to file a response. Defendant is a government entity situated in Maryland. Defendant has requested that the County Counsel's Office for Santa Clara

1 County represent it in this matter. The County Counsel's office was provided with a copy of the
2 Complaint via Federal Express on August 25, 2008. Deputy County Counsel David M. Rollo
3 has been assigned as attorney of record makes this request for the reasons set forth in the
4 accompanying declaration. Plaintiff's counsel Benjamin Nisenbaum has advised Deputy County
5 Counsel David M. Rollo of a trial set from October 27, 2008 to October 31, 2008 on a different
6 case.

7 Dated: September 3, 2008

Respectfully submitted,

8 LAW OFFICES OF JOHN L. BURRIS

9 By: /S/
10 BENJAMIN NISENBAUM
11 Attorney for Plaintiff

12 Dated: September 3, 2008

Respectfully submitted,

13 ANN MILLER RAVEL
14 County Counsel

15 By: /S/
16 DAVID M. ROLLO
17 Deputy County Counsel
18 Attorney for Defendant
19 PRINCE GEORGE COUNTY

20 PURSUANT TO STIPULATION, IT IS SO ORDERED, Defendant Prince George
21 County shall have until October 10, 2008 to respond to the Complaint. The Case Management
22 Conference is rescheduled to _____ before Magistrate Patricia V. Trumball.
23 Parties are to file a Joint Case Management Statement on or before _____.

24 Dated: _____

25 PATRICIA V. TRUMBALL
26 United States Magistrate Judge
27
28

DECLARATION OF DAVID M. ROLLO IN SUPPORT OF REQUEST

I, DAVID M. ROLLO, declare as follows:

1. That I am a Deputy County Counsel for the County of Santa Clara and have been assigned to the above-captioned case as attorney of record for defendant Prince George's County.

2. I received and reviewed the Complaint for the first time on August 27, 2008. I thereafter contacted the offices of plaintiff's counsel to discuss an enlargement of time to respond to the complaint. Both Mr. Nisenbaum and Mr. Burris were out of the office all week. I made phone contact with Mr. Nisenbaum and exchanged phone messages on Thursday and Friday, August 29. Mr. Nisenbaum has courteously agreed to an enlargement of time for defendant to respond to the complaint.

3. I do not yet have any of the underlying documents or paperwork relevant to the allegations in the complaint. Even if I did have them, my schedule is such that I will need more time to review the allegations of the complaint, talk to my client, and prepare the appropriate response.

4. This is the first time modification requested by the defendant. The initial case management order set the initial case management conference for August 5, 2008. That date was rescheduled to October 7, 2008 by the Clerk's Notice filed July 31, 2008. I am informed by the office of the Maryland State Attorney General that that office represents County Sheriffs in civil litigation and that they would likely be making an appearance in the near future as well on behalf of defendant Michael Jackson, Sheriff of Prince Georges County.

5. The requested time modification will impact the Case Management set for October 7, 2008. Defendant will simply not be in a position to collaborate on a Joint Case Management Statement by that time. It is the defendant's belief that the case is not yet fully at-issue.

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